See Britton, col. 7, lines 36-44. The ICP then finds the name of the organization in the participant database and looks up associated information based on the organization name. See Britton, col. 6, lines 50-53; Figs. 3-4. Based on the organization name, Britton then suggests delivery of a webpage containing customized advertising content. Specifically, the ICP looks up the IP address in an advertising database, locates the owner's name of the advertisement to be displayed, and locates the corresponding files in the advertisement file database. See Britton col. 7, lines 14-19; Figs. 5-6. Britton's disclosed method for dynamically forming customized web pages is therefore based entirely on the IP address and name of participant organizations.

Accordingly, Britton fails to determine the geographic location of the terminal server from which the request is received. Moreover, Britton does not maintain or track any information related to a geographic location. The tables illustrated in Britton do not contain geographic location information. See Britton, Figs. 3-6. Thus, Britton fails to disclose a database that is queried to obtain service data associated with the geographic location of the terminal server. Britton's method cannot deliver geographic location specific service data from the host system.

The Office Action points to Britton col. 5, lines 1-7 to suggest that an IP address corresponds to an assigned geographic location. The Office Action thus equates the IP address of an organization with a terminal server identifier having a geographic location. See Office Action, page 3, lines 5-9. However, an IP address itself does not contain any geographic information. The four sets of numbers in an IP address indicate the relevant domain, network, subnetwork, and host computer. This information is insufficient to identify a geographic location corresponding to an organization or client computer. Claim 1 recites a database that is queried to obtain service data associated with the geographic location of a terminal server based on a terminal server identifier. Britton, as discussed above, merely discloses the use of a formal server identifier. Britton does not relate that identifier to a geographic location. In fact, Britton does not even maintain any information related to a geographic location, making it clear that Britton fails to describe any method or database that may be used to map an IP address to a geographical location. For at least the reason discussed above, claim 1 is patentable over Britton.

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The impact of this failure by Britton to maintain or utilize information related to a geographic location in the claimed manner is significant. For example, among other things Applicant's claimed association of a terminal server identifier with a particular geographic location enables delivery of content that is localized and thus geographically relevant to the recipient. This capability is simply not made available through the teachings of Britton. Further, the delivery of geographically specific content is not a contemplated feature of Britton. Britton's features are limited to enabling an ICP to provide participant organizations with homepages containing customized advertising content, such content being "customized" in the sense that advertisements for competitors of the organization are not shown. See Britton, col. 8, lines 45-54; col. 1, lines 58-62. An ICP uses the IP address of an organization to identify files of advertising content in a database and determines that other advertisements included on the customized homepage will be non-competing. See Britton, col. 7, lines 47-55; col. 8, lines 38-40. Nowhere does Britton disclose or suggest an ICP that has the capability to provide content that is geographically relevant to an organization.

For at least these reasons, Applicant respectfully requests reconsideration and withdrawal of the rejection of amended independent claim 1 and its respective dependent claims.

Similarly, each of amended independent claims 11, 16, and 22 recites an arrangement in which a database associates a terminal server identifier with a geographic location of the terminal server to enable geographic location specific service data to be delivered to the terminal server. Accordingly, Applicant requests reconsideration and withdrawal of the rejection of amended claims 11, 16, and 22 and their respective dependent claims for the reasons discussed above with respect to amended independent claim 1.

Applicant submits that all claims are in condition for allowance.
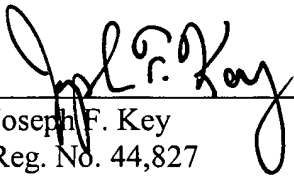
Enclosed is a $120.00 check for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 7/25/2005

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